



TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

August 30, 2010

TO: Internal File

THRU: Jim Smith, Permit Supervisor *DS 01/Sept/2010*

FROM: Steve Christensen, Environmental Scientist *SKC 8/30/10*

RE: Mine Water Discharge Monitoring, Genwal Resources, Inc., Crandall Canyon Mine, C/015/0032, Task ID #3605

SUMMARY:

On August 25, 2010, Genwal Resources, Inc. (the Permittee) submitted an amendment to the Crandall Canyon Mines Mining and Reclamation Plan (MRP). The amendment was submitted in response to Division Order (DO10A) dated August 16th, 2010.

The Division Order was issued in response to an unexpected and un-permitted post-mining discharge of water from the Crandall Canyon Mine and subsequent pollution of that water with elevated iron levels.

The Division Order outlines five requirements and their associated due dates. The amendment addresses requirement number two (II.). Requirement II calls for the Permittee to amend the MRP to reflect additional water monitoring and data collection. Specifically, the Permittee must revise the MRP to include a commitment to submit the mine-water discharge monitoring data to the Division monthly. The data is to be submitted electronically using the Division's water monitoring database EDI system. Mine-water discharge rate data will be provided in a spreadsheet format.

The amendment meets the requirements of item II from the Division Order. The amendment should be approved at this time.

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TECHNICAL ANALYSIS:

OPERATION PLAN

HYDROLOGIC INFORMATION

Regulatory Reference: 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, -301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

Analysis:

Groundwater Monitoring

The amendment meets the requirements outlined in Item II of the August 16th, 2010 Division Order regarding updates to the MRP to reflect the additional water-monitoring and data collection relative to the mine-water discharge.

On page 7-32 of the amendment, in Table 7-4(A), *Mine-Water Discharge Analysis List* the Permittee lists the additional monitoring to be conducted on the pre-treatment, mine-water. The list of additional parameters and measurements is as required in the Division Order.

Additionally the Permittee commits to submitting the additional mine-water discharge data to the Division on a monthly basis. The commitment outlines that the additional data will be submitted electronically using the Division's water monitoring database EDI system. The exception to this commitment is the mine-water discharge rate data. The measured discharge rate will be provided to the Division in a spreadsheet format.

Findings:

The amendment meets the requirements in Item II of the August 16, 2010 Division Order.

RECOMMENDATIONS:

The amendment should be approved.